

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of WT Docket No. 05-235)
Amendment of Part 97 of the Commission's Rules)
To Implement WRC-03 Regulations Applicable to)
Requirements for Operator Licenses in the Amateur Radio Service)

TO: The Commission

COMMENTS OF FREDERICK V. ADSIT

I. COMMENTER'S BACKGROUND

I am filing these comments in response to the *Notice of Proposed Rule Making and Order* ("Notice") in WT Docket 05-235. My name is Frederick V. Adsit. I hold an Extra Class amateur radio license with the call sign NY2V. I have been a licensed ham since 1948. At that time there was no Extra Class license. The Morse code sending and receiving tests at that time required proficiency at a speed of 13 words per minute. Since that time I have balanced my operating using many modes, such as Morse code, AM and SSB radiotelephony, AMTOR, PACTOR, GTOR, and NBFM, SSB and CW on VHF, including auroral communications. I have been an active public servant, with emphasis on the National Traffic System, coupled with membership in ARES and RACES emergency communications organizations. I have held numerous leadership positions in area clubs and in the NTS system. I am currently an active member of the ARRL, QCWA, Antique Wireless Association, and FISTS NA Chapter of the International Morse Preservation Society. My career was spent as a systems engineer in the fields of guided missiles, radar and sonar. I am very concerned about the future of the amateur radio service and the integrity of the licensing system which dictates what increasingly little knowledge and effort it takes to earn an amateur radio license.

II. SUMMARY

In the Notice, you contend that maintaining a telegraphy requirement for the General Class License would not be in the public interest. You further conclude that maintaining the telegraphy requirement for the Amateur Extra Class is also not in the public interest. You present arguments for and against the elimination of the telegraphy requirement. How these arguments influenced your position on the Extra Class requirement is not entirely clear, partly because you lumped eighteen Petitions for Rulemaking into one NPRM response. You did cite, in paragraphs 19 and 20 of the NPRM, these basic reasons for concluding that elimination of the requirement for Extra is desirable: (1) Telegraphy has little value as an emergency communications mode as the amateur community no longer uses telegraphy because voice and digital modes are faster; (2) Even if there is value to the use of telegraphy in emergency communications, there is no requirement that amateur operators must provide emergency communications; (3) No other mode requires demonstration of ability, and that such special treatment of telegraphy in examinations for the licenses is unwarranted; (4) Given the fact that telegraphy operation is not required by the Commission's rules, and given that the international requirement for telegraphy ability has been dropped, a Morse code examination is no longer necessary; (5) a one-time demonstration does not guarantee future proficiency and (6) Morse code ability is not a significant contributor to the amateur's ability to advance the art.

III. BRIEF COMMENTS and SUPPORT FOR ROLAND A. ANDERS COMMENTS

All the points in the summary are elaborated upon, very clearly and in detail, by another radio amateur, ROLAND A. ANDERS, K3RA, in his comment filing signed 8/11/05 (appears in the ECFS on 9/30/05). I agree with all that he wrote, so I have elected to call your attention to his comments rather than write my own. My draft commentary ran roughly twice the length of Mr. Anders', and I was driving for a one-page response so that you would read it. Mr. Anders makes

too much sense to be ignored or dismissed without your reconsidering what you have done and are doing to the amateur radio service. I respect your authority but I do not respect your dumbing down this service in the obvious self-serving interests of reducing the FCC workload and thus cutting the agency's drain on the federal budget.

Since Mr. Anders' comment filing is readily accessed by you and by others, I will not attach it or print it here. I accessed it at this location, then downloaded it for a thorough review:
http://gulfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6518164236.

IV. CONCLUSION

I believe for the reasons stated and referred to above that the public interest and the purposes for the Amateur Radio Service as set forth in Part 97.1 will best be served by maintaining the requirements for Morse code testing for the Extra Class license. It is a shame that a meaningful speed such as 20wpm is not again possible. However, the serious mistake of reducing that to 5wpm, and now, tentatively to no test at all, has been made by the FCC and there is clearly no backing up now. The dumbing down of amateur radio test requirements continues, and I remain very concerned about the future of the amateur radio service in this country. Morse code is far from dead, and it is totally unreasonable to award the title of Extra Class or Expert to an amateur radio operator who has no familiarity with a mode used by a large segment of the amateur radio community.

Thank you for providing the opportunity to comment on this proposal.

Sincerely,

/s/ **Frederick V. Adsit**

Frederick V. Adsit
Amateur Radio NY2V
FRN 0001718169

10/10/05